

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CARRIE SUE MANN,

Defendant.

INDICTMENT

_____/

The Grand Jury charges:

COUNT 1

(Concealment of Event Affecting Entitlement to SSI Payments)

From in or about June 2015 through in or about February 2023, in the Western District of Michigan, Southern Division, defendant,

CARRIE SUE MANN,

having knowledge of the occurrence of an event affecting her continued entitlement to payment of Supplemental Security Income (SSI) under Subchapter XVI of Chapter 7 of Title 42 of the United States Code on behalf of herself and her minor daughter, M.B., knowingly concealed and failed to disclose such event with an intent fraudulently to secure payment in a greater amount than was due or when no payment was authorized, in that she then and there failed to notify the Social Security Administration that she was living in the same household as her husband, and, as a result, received approximately \$110,124.42 in SSI payments to which she was not entitled.

42 U.S.C. § 1383a(a)(3)

COUNT 2
(Theft of Government Funds)

From in or about June 2015, through in or about February 2023, in the Western District of Michigan, Southern Division, defendant,

CARRIE SUE MANN,

knowingly and willfully stole and converted to her own use more than \$1,000 of money belonging to the United States, in that she then and there received and used approximately \$107,241.75 in U.S. Department of Health and Human Services funds disbursed through the Michigan Department of Health and Human Services Medicaid program, when, as she then and there knew, she was not eligible to receive such payments at all or in part because of her household income.

18 U.S.C. § 641

COUNT 3
(Theft of Government Funds)

From in or about July 2020, through in or about November 2020, in the Western District of Michigan, Southern Division, defendant,

CARRIE SUE MANN,

knowingly and willfully stole and converted to her own use more than \$1,000 of money belonging to the United States, in that she then and there received and used approximately \$1,394.00 in U.S. Department of Agriculture funds disbursed through the Michigan Department of Health and Human Services Food Assistance Program, when, as she then and there knew, she was not eligible to receive such payments at all or in part because of her household income.

18 U.S.C. § 641

A TRUE BILL



GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



DONALD DANIELS
Assistant United States Attorney